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REMARKS

This amendment is intended as a full and complete response to the non-final Office Action mailed February 2, 2004. In the Office Action, the Examiner notes that claims 1-15 are pending, claims 1-15 are rejected, and claims 3 and 12 are objected to. By this amendment, claims 1 and 9 are amended, claims 3 and 12 are canceled and all other claims continue unamended.

In view of both the amendments presented above and the following discussion, Applicants submit that none of the claims now pending in the application are anticipated under the provisions of 35 U.S.C. §102 or obvious under the provisions of 35 U.S.C. §103. Thus, Applicants believe that all of these claims are now in allowable form.

It is to be understood that Applicants, by amending the claims, do not acquiesce to the Examiner's characterizations of the art of record or to Applicants' subject matter recited in the pending claims. Further, Applicants are not acquiescing to the Examiner's statements as to the applicability of the art of record to the pending claims by filing the instant responsive amendments.

Objections**Claims 3 and 12**

The Examiner has objected to claims 3 and 12 because of the following informalities: "Lines 3 and 5 should read, 'to one or more edges of a frame' and 'nearest to said selected object'." Applicants have canceled claims 3 and 12. However, similar language in amended claims 1 and 9 has been provided according to the Examiner's suggestion. Therefore, Applicants respectfully submit that the Examiner's objections with respect to claims 3 and 12 are moot.

Drawings

The Examiner has objected to the drawings "for failing to comply with 37 C.F.R. 1.84(p)(4) because the following reference signs are not mentioned in the description: 63, 80, 86, 91, 92, 94 and 95." Applicants have amended the description to include the missing reference signs. It is also noted that reference sign 80 is mentioned on page

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13, line 15 of the specification. Therefore, Applicants respectfully submit that the drawings comply with 37 C.F.R. 1.84(p)(5) and respectfully request that the Examiner's objections be withdrawn.

Rejection under 35 U.S.C. §102

The Examiner has rejected claims 1-4 as being clearly anticipated by Kamada (U.S. Patent No. 6,622,306, hereinafter "Kamada"). Applicants respectfully traverse the rejection.

Applicants' amended Independent claim 1 recites:

"A system for navigating video images and selecting at least one object in said video images comprising:

a) a video image generator for generating at least one video image to be navigated, each video image including at least one object that can be navigated to and selected; and

b) a mapping application interfaced to said image generator for receiving navigation commands from an input device and instructing said video image generator to navigate to said objects, said mapping application including linking information identifying which of said objects is to be navigated to based upon a presently selected object and a received navigation command;

wherein said video images include a plurality of frames, each frame containing at least one object; and

said mapping application generates an edge of frame indication for a selected object if the selected object is adjacent to an edge of a frame; and

said mapping application employing said edge of frame indication in conjunction with a command received from an input device to link said selected object to an object in an adjacent frame that is nearest to said selected object in a direction that is dependent on the received command."

"Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim" (Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 730 F.2d 1452, 221 U.S.P.Q. 481, 485 (Fed. Cir. 1984)(citing Connell v. Sears, Roebuck & Co., 722 F.2d 1542, 220 U.S.P.Q. 193 (Fed. Cir. 1983)) (emphasis added).

The Kamada reference is directed to an internet television apparatus which includes, in relevant part, "a means for recognizing anchor tags existing in the HTML document to detect mutual positional relationships among hot spots, corresponding to the recognized anchor tags, on the browser screen so as to generate a transfer list

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which defines a positional relationship...." (see Abstract). As noted in column 4, lines 49-51:

"hot spots [are] usually represented by underlined characters or colored characters or framed pictures."

That is, hot spots are hypertext words or images, wherein the words or images have associated with them a resource address that is invoked upon a selection of the hot spot word or image.

By contrast, Applicants' invention teaches a navigation strategy adapted to video images using frames (not framed pictures), wherein frames are defined as "containing at least one object." By contrast, the Kamada reference does not utilize techniques that are adapted for navigating in a framed environment. It should be noted that the term "frame" as used in conjunction with Kamada's description of a hot spot is not the same as the term "frame" as used by the Applicants. Specifically, as is well known in graphical environments, an image such as a picture object is typically bounded by a thin line which changes color upon selection or navigation to the picture object. This thin line in the simple artistic sense may be defined as a frame around the picture. However, a frame around a picture is not the same as the functional entity known as a frame within the context of frame enabled web pages, as discussed in the background of the art portion of the present description. Specifically, "a frame of a web page may contain multiple objects which perform particular functions when navigated to and selected" (see Background). This is not the functionality disclosed, suggested or claimed within the Kamada reference.

Furthermore, the Kamada reference fails to disclose or suggest the claimed

"said mapping application generates an edge of frame indication for a selected object if the selected object is adjacent to an edge of a frame; and said mapping application employing said edge of frame indication in conjunction with a command received from an input device to link said selected object to an object in an adjacent frame that is nearest to said selected object in a direction that is dependent on the received command."

In contrast to the above-quoted claim language, the Kamada reference fails to disclose or suggest utilizing frames and navigating frames as defined by the Applicants, as well as the specific edge of frame indication claimed herein.

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As such, Applicants submit that independent claim 1 is not anticipated and fully satisfies the requirements of 35 U.S.C. §102 and is patentable thereunder. Finally, since claims 2-4 depend directly or indirectly from independent claim 1 and recite additional limitations therefrom, these dependent claims are also patentable for at least the reasons discussed above with respect to claim 1. Therefore, Applicants respectfully request withdrawal of the rejection of claims 1-4.

Rejection under 35 U.S.C. §103

Claims 5-6, 9-13 and 15

The Examiner has rejected claims 5-6, 9-13 and 15 under 35 U.S.C. 103(a) as being unpatentable over Kamada in view of Goodman et al. (U.S. Patent 6,100,875, hereinafter "Goodman"). Applicants respectfully traverse the rejection.

The test under 35 U.S.C. §103 is not whether an improvement or a use set forth in a patent would have been obvious or non-obvious; rather, the test is whether the claimed invention, considered as a whole, would have been obvious. Jones v. Hardy, 110 U.S.P.Q. 1021, 1024 (Fed. Cir. 1984) (emphasis added). Moreover, the invention as a whole is not restricted to the specific subject matter claimed, but also embraces its properties and the problem it solves. In re Wright, 6 U.S.P.Q. 2d 1959, 1961 (Fed. Cir. 1988) (emphasis added). The combination of Kamada and Goodman fails to teach or suggest Applicants' invention as a whole.

The limitations of the Kamada reference as applied to the claimed invention are discussed above with respect to claim 1. The Goodman reference fails to bridge the substantial gap between the Kamada arrangement and the claimed invention. Specifically, Goodman discloses apparatus and method emulating mouse pointer functions utilizing a keyboard having an additional special function key (per Abstract). More specifically, the Goodman reference fails to disclose or suggest at least those missing portions of claim 1 noted above with respect to the Kamada reference. Therefore, for at least the reasons discussed above with respect to claim 1, any operable combination of the Kamada and Goodman arrangements fails to disclose or suggest the invention of claim 1. Since claim 9 includes relevant limitations similar to those found in claim 1, any such combination of Kamada and Goodman also fails to

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disclose or suggest the invention of claim 9. Finally, since all of the remaining claims depend, either directly or indirectly, from claims 1 or 9, each of these dependent claims is also patentable for at least the reasons discussed above with respect to claim 1 and herein. Therefore, Applicants respectfully request that the rejection of claims 5, 6, 9, 10, 11, 13 and 15 be withdrawn.

As such, Applicants submit that claims 5-6, 9-13 and 15 are not obvious and fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder. Therefore, Applicants respectfully request that the rejection be withdrawn.

Claims 7-8

The Examiner has rejected claims 7-8 under 35 U.S.C. 103(a) as being unpatentable over Kamada in view of Johnson et al. (U.S. Patent 5,077,607, hereinafter "Johnson"). Applicants respectfully traverse the rejection.

The Johnson reference fails to bridge the substantial gap between the Kamada arrangement and the claimed invention. Specifically, Johnson discloses a cable television transaction terminal that generates teletext screens suitable for use on a display terminal. In response to user keypad entry, different teletext screens may be recalled from memory and displayed. This is entirely unlike the claimed invention.

Specifically, as noted above with respect to the deficiencies of the Kamada reference as applied to claim 1, the Kamada reference and Johnson reference, in any operable combination, still fail to disclose or teach at least the claim 1 limitation of

"wherein said video images include a plurality of frames, each frame containing at least one object".

Therefore, for at least the reasons discussed above with respect to claim 1, any operable combination of the Johnson and Kamada arrangements fails to disclose or suggest the invention of claim 1. As such, Applicants submit that independent claim 1 is not obvious and fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder. Finally, since claims 7 and 8 depend directly or indirectly from independent claim 1 and recite additional limitations therefrom, these dependent claims are also patentable for at least the reasons discussed above with respect to claim 1. Therefore, Applicants respectfully request withdrawal of the rejection of claims 7 and 8.

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As such, Applicants submit that claims 7-8 are not obvious and fully satisfy the requirements of 35 U.S.C. §103 and are patentable thereunder. Therefore, Applicants respectfully request that the rejection be withdrawn.

Claim 14

The Examiner has rejected claim 14 under 35 U.S.C 103(a) as being unpatentable over Kamada in view of Goodman in further view of Johnson. Applicants respectfully traverse the rejection.

Neither the Goodman arrangement nor Johnson arrangement, either singly or in any operable combination, bridges the substantial gap between the Kamada arrangement and the claimed invention. Specifically, as discussed above, none of these arrangements disclose, suggest, teach or claim at least the following portion of Applicants' claim 9:

"wherein said video images include a plurality of frames, each frame containing at least one object; and said mapping application generates an edge of frame indication for a selected object if the selected object is adjacent to an edge of a frame; and said mapping application employing said edge of frame indication in conjunction with a command received from an input device to link said selected object to an object in an adjacent frame that is nearest to said selected object in a direction that is dependent on the received command."

As such, Applicants submit that claim 14 is not obvious and fully satisfies the requirements of 35 U.S.C. §103 and is patentable thereunder. Therefore, Applicants respectfully request that the rejection be withdrawn.

CONCLUSION

Thus, Applicants submit that none of the claims, presently in the application, is anticipated or obvious under the respective provisions of 35 U.S.C. §102 or §103. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, it is requested

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that the Examiner telephone Eamon J. Wall, Esq. at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

Dated: 6/2/04



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